



# The Republican Party of Kentucky

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June 13, 2003

**HAND DELIVERED  
TO KREF**

06-13-03A11:07 RCPD

Hon. Rosemary F. Center  
General Counsel  
Kentucky Registry of Election Finance  
140 Walnut Street  
Frankfort, Kentucky 40601

Re: Requests for Advisory Opinion Pursuant to KRS 121.135

Dear Ms. Center:

The following request is made on behalf of the Republican Party of Kentucky ("RPK") and all of the various Republican nominees ("nominees") running on the Republican ticket in the general election to be held on November 4, 2003. This request is, also, intended to cover the actions of employees of RPK and/or all of the various nominees and the employees of their respective campaign committees.

The Registry's interpretation of the various statutes is all the more important this year due to the fact that the Legislature only deleted a portion of the public financing law effecting elections and left in place a good many statutes effecting the financing of political races in Kentucky. Given that there is no public money involved in the race this fall, the need for safeguards is not as great, thus the following questions are relevant to those involved.

The questions for your consideration and response are as follows:

1. Are the nominees for Governor, Lieutenant Governor, Attorney General, Treasurer, Agricultural Commission, Auditor, and Secretary of State considered to be statewide nominees by the Registry?
2. Under what circumstances may a statewide nominee's campaign rent and/or use without charge office space and equipment paid for by a political party?
3. Under what circumstance may a statewide nominee's campaign provide a political party with its campaign plan, travel schedule, policy statements, press releases, etc.? Once received by a political party what can the party do with those materials?
4. May a political party inform its statewide nominees of its campaign plan and budget?
5. Under what circumstances may a statewide nominee's campaign and a political party share surrogates for fundraising purposes, provided that each entity has its own event and pays for its own expenses?

6. Under what circumstances may a statewide nominee's share survey (polling) results with other statewide nominees and/or a political party?
7. The State Board of Elections provides that political parties maintaining a statewide list of registered voters may share it with all of its nominees. Under what circumstances may a statewide nominee share with the political party information to update the registered voter list?
8. Under what circumstances may a political party distribute collateral materials (bumper stickers, etc.) for statewide nominees?
9. Under what circumstances may a political party host meetings involving statewide nominees and grass roots activist?
10. Is a statewide nominee's campaign limited to receiving \$1,000.00 in the aggregate from the political party state executive committee or can a statewide nominee receive \$1,000.00 from each individual executive committee?
11. Under what circumstances may a political party communicate with members of a statewide nominee's volunteer organization?
12. Under what circumstances may a statewide nominee's campaign communicate with a political party?
13. Under what circumstances may a political party and its statewide nominee's campaign work together to build a volunteer grass roots organization?
14. Under what circumstances may a political party assist its statewide nominees' campaign with the logistics associated with the setup of campaign appearances at various locations around the state?
15. Under what circumstances may a political party send an individual to speak at a public event on behalf of a state wide nominee?
16. Under what circumstances may a political party assist a statewide nominee's campaign with scheduling, such as passing along gathered information on events and political functions to those nominees?
17. To what extent can a political party communicate with the nominee's campaign to become informed of the nominee's general campaign plans so that there will be no duplication of effort by the nominee with that of the political party and vice versa?
18. Has the Registry's interpretation of the meaning of "contribution" changed any from its definition set forth in KREF Advisory Opinion 95-006, if so, to what extent?



19. If the Registry was posed the same identical questions presented to it that resulted in the above Advisory Opinion 95-006 today, how would its answers and responses to those questions differ, if any?

20. Under what circumstances can a nominee use office space and equipment paid for by a political party in certain regions of the state so long as that office space and equipment is also made available to all statewide nominees of the same party?

21. May a gubernatorial campaign committee organize/form an advisory board of volunteers who may individually or collectively:

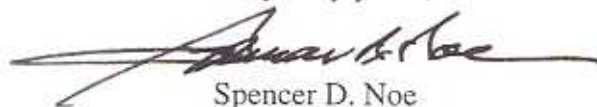
- Provide policy advice for the campaign;
- Provide strategic advice for the campaign;
- Solicit campaign contributions for the campaign;
- Serve on select subcommittees of the campaign;
- Promote the gubernatorial slate; or
- Assist the coordination of other committees within the gubernatorial campaign committee, such as yard sign committees, campaign staff, direct mail, finance, media, etc.

The board of volunteers will not be authorized to make expenditures on behalf of the gubernatorial campaign committee or to receive contributions for the gubernatorial campaign committee. The members of the advisory board will not be authorized to act or speak on behalf of the gubernatorial campaign committee. The board of volunteers may be given a name such as the "Task Force to Elect John Doe for Governor."

Your prompt attention to the above would be greatly appreciated do to the confused nature of the statutes everyone is expected to operate under.

Best regards, I remain,

Very truly yours,



Spencer D. Noe  
Republican Party of Kentucky